

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re:

Reginald Albert Benjamin
Debtor 1

Lindsey Rae Benjamin
Debtor 2

Capital One Auto Finance, a Division of Capital One, NA
Movant(s)

v.

Reginald Albert Benjamin

Lindsey Rae Benjamin

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:24-BK-01762-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 73

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Reginald Albert Benjamin and Lindsey Rae Benjamin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Paragraph 1 contains a conclusion of law to which no response is required.
2. Admitted.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Paragraph 4 contains a conclusion of law to which no response is required.
5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 5; therefore, it is denied.
6. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 6; therefore, it is denied.
7. Upon information and belief, the averment as stated in Paragraph 7 is admitted.
8. Admitted.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 9; therefore, they are denied.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, it is denied.

11. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 11; therefore, it is denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: May 22, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, May 22, 2025, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Elizabeth Trachman, Esquire
Orlans Law Group
200 Eagle Road
Building 2, Suite 120
Wayne, PA 19087
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire